

Joint Status Report Pursuant to Rule 26(f)

Caption: Karen H. Egelkamp v. Archdiocese of Philadelphia Civil Action No: 19-3734

Basis of Jurisdiction: Federal Question (Title VII and Equal Pay Act)

Jury Trial: YES Non-Jury Trial: _____ Arbitration: _____

Plaintiff's counsel participating in the Rule 16 Conference: Bryan Lentz and Kiersty DeGroote

Defendants counsel participating in the Rule 16 Conference: Nick Centrella and Jacquie Ager

Do counsel have full authority to settle at Rule 16 Conference? YES

If not, client with such authority who will attend conference: N/A

When did the parties hold the Rule 26 Conference? 1/10/2020

When did the parties comply with the Rule 26(a)'s duty of self-executing disclosure? 1/16/2020
(anticipated per the Court's order)

Does either side expect to file a case-dispositive motion? YES

If yes, under what Rule: FRCP 56

If yes, specify the issue: Defendant may argue that Plaintiff cannot establish a prima facie case of Title VII and/or Equal Pay Act discrimination and/or retaliation.

Proposed deadline for filing dispositive motions: 30 days after the close of expert discovery (see attached proposed scheduling order).

Does either side anticipate the use of experts? YES

If yes, what is the proposed deadline for expert discovery? Plaintiff's deadline 30 days after the close of fact discovery; Defendant's deadline 30 days thereafter (see attached proposed scheduling order); deadline to complete depositions of experts 30 days thereafter.

Approximate date case should be trial-ready: 45 days after resolution of a dispositive motion. Alternatively, September 28, 2020 if no dispositive motion is filed (see attached proposed scheduling order).

Time for Plaintiff's case: Three (3) days Time for Defendant's case: Three (3) days
Is a settlement conference likely to be helpful? YES If so, when:

Early: NO After Discovery: YES

Do the parties wish to proceed before a Magistrate Judge for final disposition? Not at this time.

Plan for Discovery:

1. The parties anticipate that discovery should be completed within 90 days (for fact discovery).
2. What is the minimum amount of time necessary to complete discovery prior to an ADR session, should one be ordered or agreed to?
After the close of expert discovery (approximately July 15, 2020).

3. Have the parties discussed issues relating to claims of privilege or of protection as trial-preparation material, as required by Rule 26(f)(3)(D)?

The parties do not anticipate any privilege issues at this time.

4. Identify any other discovery issues which should be addressed at the Rule 16 Conference, including limitations on discovery, protective Orders needed, or other elements which should be included in a particularized discovery plan.

The parties anticipate requesting that the Court enter a stipulated confidentiality agreement governing certain sensitive documents (such as medical records and proprietary information).

5. If you contend the discovery period to exceed 90 days, please state reason:

The parties believe they can complete fact discovery within 90 days. The parties request additional time for the completion of expert discovery (see attached proposed scheduling order).

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

KAREN H. EGELKAMP,

Plaintiff,

v.

ARCHDIOCESE OF PHILADELPHIA,

Defendant.

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Civil Action No. 19-CV-3734

ORDER

AND NOW, on this _____ day of _____, 2020, it is hereby **ORDERED** that the following case management deadlines apply to the above-captioned matter:

1. Fact discovery deadline is **Wednesday, April 15, 2020**.
2. Plaintiff's expert disclosure deadline is **Friday, May 15, 2020**.
3. Defendant's expert disclosure deadline (and deadline to complete IME, if any) is **Monday, June 15, 2020**.
4. Close of expert discovery (including depositions of experts) is **Wednesday, July 15, 2020**.
5. Dispositive motion deadline is **Friday, August 14, 2020**.
6. If a dispositive motion is filed, the case will be stayed pending resolution of the dispositive motion(s).
7. If no dispositive motion is filed, the case will be ready for trial by **Monday, September 28, 2020**.
8. The Court will enter an order governing additional pre-trial deadlines after all dispositive motions are resolved or after the dispositive motion deadline has passed without the filing of a motion.

BY THE COURT:

Gerald J. Pappert, J.